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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - X

UNITED STATES OF AMERICA

- against -

WILSON CHENG,

Defendant.

- - - - - - - - - - - - - - X

COMPLAINT

(T. 18, U.S.C. § 2252(a)(2))

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTIAN ALBANESE, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about and between June 13, 2016 and October 5, 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant WILSON CHENG did knowingly receive and distribute any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(2)).

4. Peer to peer file sharing ("P2P") is a method of communication available to Internet users through the use of special software. Computers linked together through the Internet using this software form a network that allows for the sharing of digital files between users on that network. A user first obtains the P2P software, which can be downloaded from the Internet. In general, P2P software allows the user to set up files on a computer to be shared with others running compatible P2P software. A user obtains files by opening the P2P software on the user's computer, and conducting searches for files that are currently being shared on another user's computer.

5. One aspect of P2P file sharing is that multiple files may be downloaded in parallel, which permits downloading more than one file at a time.

6. A P2P file transfer is assisted by reference to an IP address. This address, expressed as four sets of numbers separated by decimal points, is unique to a particular computer during an online session. The IP address provides a unique location making it possible for data to be transferred between computers.

7. Third party software ("Network Monitoring Program" or "Investigative Software") is available to identify the IP address of the P2P computer sending the file. Such software monitors and logs Internet and local network traffic.

8. One investigative method employed in this investigation involves the use of an Investigative Software ("IS"), which is currently used in P2P file sharing investigations to directly download files of child pornography from P2P network users. The IS is designed to "direct connect" to one IP address and browse or download from one

specific P2P network user at a time. The IS is a P2P file sharing software similar to other file sharing software used on P2P networks which are free and available to the public.

9. On or about September 22, 2016, an HSI agent signed into a P2P network using IS computer software. The IS located a computer using the IP Address 72.89.20.132 ("IP Address") that was using the P2P network to make available certain hash values and files with file names that contained certain words generally known to be associated with child pornography images and videos, and which are known by law enforcement to match suspected child pornography hash values.

10. Between on or about June 13, 2016 and September 28, 2016 (the "Download Period"), the IS "direct connected" to the IP Address and displayed numerous files being hosted by the user of the IP Address. Using the IS and P2P networks, the HSI agent downloaded numerous files from the computer at the IP Address to include the following:

a. A mpg video file, approximately one (1) minute and thirty (34) seconds in duration, depicting a pre-pubescent female being vaginally penetrated by an adult male hand. In addition, the adult male penetrates the pre-pubescent female with his erect male penis. Hash Value: 121A0B549DE795FF9F76BE76D6.F121D.MPG;

b. A mpeg video file, approximately one (1) minute in duration, depicting a pre-pubescent female with her legs spread open and an adult male performing oral sex on the pre-pubescent female. In addition, the adult male penetrates the pre-pubescent female with his erect male penis. Hash Value: 881CD58762DD0372093223AA277653.MPEG;

c. An avi video file, approximately three (3) minutes and seventeen (17) seconds in duration, depicting a pre-pubescent female with her hand stimulating an erect male penis. In addition, the adult male penetrates the pre-pubescent female with his erect male penis. Hash Value: E99BF46F1FF29C8B03EF46BFFBCF69E1.AVI;

d. An avi video file, approximately two (2) minutes in duration, depicting a pre-pubescent female who appears to be lying down asleep. The adult male spreads the pre-pubescent female's legs open and rubs his erect male penis against her genitals and then ejaculates on her genitals and legs. The adult male then wipes her down and then puts her pajamas back on. Hash Value: ACA7A7135A8947CADDC03E4B5AACC2E9.AVI.

11. Based on my review of records obtained from Verizon, the IP Address was assigned to an account located in Brooklyn, New York (the "PREMISES").

12. On October 6, 2016, HSI agents executed a search warrant, issued on October 3, 2016 by the Honorable Roanne L. Mann, at the PREMISES.

13. The defendant WILSON CHENG and his mother reside together at and were present when HSI executed the search warrant. Agents provided a copy of the search warrant and items to be seized to the defendant and his mother to read. Agents informed the defendant and his mother that they were there to execute the search warrant. The defendant brought agents into his bedroom to speak away from his mother and confirmed that they were standing in his personal bedroom. He identified his wireless internet connection for agents and confirmed that all computer equipment in his bedroom, including a laptop and two external hard drives, are his and that only he uses them. His mother identified other electronic equipment in the apartment, that was not located in the defendant's bedroom, which was hers.

14. A preliminary search of the defendant's laptop, two hard drives and cellular telephone revealed numerous files containing child pornography, with the most recent download having occurred on October 5, 2016. In addition to those listed above, agents identified the following on the defendant's devices:

a. “2yo - Venezuela girl creampied.” This video depicts a pre-pubescent female being vaginally and orally penetrated by an adult erect male penis. In addition, the adult male ejaculates inside the pre-pubescent female. This video runs for approximately four (4) minutes and thirty-nine (39) seconds

b. “Vicky - 11yo swallow cum.” This video depicts a known child victim, Vicky. This video depicts a pre-pubescent female being orally penetrated by an erect male penis. In addition, the adult male ejaculates in the pre-pubescent females mouth. This video runs for approximately five (5) minutes and sixteen (16) seconds.

c. “Baby J - 3yo full sex 1.” This video depicts a pre-pubescent female being vaginally penetrated by an adult male hand. In addition, this video depicts a pre-pubescent female being vaginally and anally penetrated by an adult erect male penis. In addition, the adult male ejaculates inside the pre-pubescent female. This video runs for approximately five (5) minutes and forty-four (44) seconds.

WHEREFORE, your deponent respectfully requests that the defendant WILSON CHENG be dealt with according to law.

Christian Albanese
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
6th day of October, 2016

THE HONORABLE ROANNE L. MANN
UNITED STATES CHIEF MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK